

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Bernard Howell, Sr., individually, and  
Bernard Howell, Sr., as parent and custodian  
of BH, Jr.,

Case No. 0:23-cv-01600-JRT-DTS

Plaintiff,

v.

Frontier Airlines Holdings, Inc.,

Defendant.

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**STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

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Plaintiff, Bernard Howell, for himself, and as parent and natural guardian of B.H., Jr., a minor (“Plaintiff”), and Defendant, Frontier Airlines Holdings, Inc. (“Defendant”) (collectively the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

1. Plaintiff filed his Complaint on June 6, 2023. *See* ECF No. 3.
2. On October 5, 2023, the Court ordered that Plaintiff must notify Defendant regarding the Summons and Complaint and subsequently file proof of service showing that notification upon Defendant was made. *See* ECF No. 5.
3. On October 10, 2023, Plaintiff served Defendant with the Summons and Complaint. *See* ECF No. 6.
4. On October 11, 2023, Plaintiff filed an Affidavit of Service with the Court. *See* ECF No. 6.
5. The initial deadline for Defendant to respond to the Complaint was October 31, 2023.
6. On October 31, 2023, Plaintiff filed his Motion for Entry of Default Judgment. *See*

ECF No. 7.

7. To date, the Court has not set a hearing date for Plaintiff's Motion for Entry of Default Judgment. *See* ECF No. 8.

8. The Parties have agreed that Defendant may have an extension until Thursday, November 30, 2023 to respond to the Complaint, and request that the Court enter the [Proposed] Order filed concurrently herewith.

9. As a result of the above extension, Plaintiff will move to strike his Motion for Entry of Default Judgment.

10. The proposed new deadline will not alter or affect any dates previously set on the Court's calendar and it will not affect the progress of the case.

**IT IS SO STIPULATED AND RESPECTFULLY SUBMITTED:**

Dated: 11/14/2023

**MORRIS LAW GROUP, P.A.**

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Dated: 11/14/2023

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